



June 7, 2017

Sam Coleman
Region 6 Acting Administrator
Environmental Protection Agency, Region 6
1445 Ross Ave., Suite 1200
Dallas, Texas 75202-2733

RE: Arkansas Regional Haze FIP/SIP

Dear Mr. Coleman:

Thank you for your continued engagement with ADEQ on issues associated with Arkansas's Regional Haze plan. ADEQ intends to complete development of revisions to the disapproved parts of the State Implementation Plan (SIP) in a truncated timeframe and submit them to EPA as soon as practicable to ensure a swift return of the Regional Haze program to the State of Arkansas. We anticipate proposing SIP revisions in one of two forms discussed below no later than late summer of 2017. We request that EPA review and approve the SIP revisions as expeditiously as possible and take action no later than six months after receipt of the ADEQ's SIP revision packages.

While we welcomed the Region's decision to grant a partial reconsideration of its Federal Implementation Plan (FIP), the Federal Register notice neither addressed certain critical issues, nor provided adequate certainty as to a mechanism for relief from the measures in the FIP to be reconsidered. Therefore, we continue to request that EPA stay and toll the FIP's compliance deadlines while it reconsiders all matters raised in the petitions for reconsideration until such time as the Region approves our SIP revisions.

As we have previously stated, and as the Region has agreed, the ultimate goal of our efforts is to return the Regional Haze program implementation to the State by approving our SIP. The SIP will rescind and supplant the FIP by addressing appropriate controls based on visibility conditions and trends, while considering the remaining useful life of the affected facilities and the cost of controls. ADEQ is well underway in engaging stakeholders and developing approvable revisions to our Regional Haze SIP for submittal to EPA. These revisions are intended to address the portions of the State's original Regional Haze SIP submitted in 2008 and disapproved in 2012.

ADEQ is considering two options for submission of revisions: a single SIP revision addressing all disapproved elements of the 2008 Regional Haze SIP or two partial SIP revisions. The two partial SIP revisions option would consist of one partial SIP revision to address nitrogen oxide emissions from electric generating units and a second partial SIP revision to address the

remaining disapproved elements of the 2008 Regional Haze SIP. If we choose to submit a single SIP revision package, we anticipate that proposal would occur in late summer 2017. If we choose to submit multiple partial SIP revision packages, we anticipate that proposal of the nitrogen oxides partial SIP revision would occur in July of 2017 and the second partial SIP revision proposal would occur in late summer 2017. We will provide a draft version of the SIP to both the Region and parties of interest in late-June or early July, 2017.

To further minimize potential costs to ratepayers, ADEQ requests a stay be granted for NOx emission limits for Arkansas subject-to-BART electric generating units and Entergy Independence included in the 2016 rule "Promulgation of Air Quality Implementation Plans; State of Arkansas; Regional Haze and Interstate Visibility Transport Federal Implementation Plan; Final Rule." This stay is requested until EPA's final action on the Arkansas SIP revisions as described above.

We look forward to submitting an approvable plan to you. In the interim, our collaborative efforts will continue and we will keep you apprised at every step of the process.

Sincerely,



Becky W. Keogh
Director